

1 Honorable Marsha J. Pechman
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 COINLAB, INC., a Delaware Corporation

11 NO. 2:13-cv-777-MJP

12 Plaintiff,

13 v.
14 Mt. GOX KK, a Japanese corporation, and
15 TIBANNE KK, a Japanese corporation.
16 Defendants.

17 I, Roger M. Townsend, hereby declare as follows:

18 1. I am an attorney at Breskin Johnson & Townsend, PLLC, and counsel for
19 Plaintiff Coinlab, Inc. ("Coinlab") in the above-captioned action. I am a member in good
20 standing with the bar of the State of Washington. I am over the age of eighteen, can
21 attest to the following matters from personal knowledge, and if called as a witness,
22 could competently testify to the matters set forth herein.

23 2. Attached hereto as **Exhibit 1** is a true and correct copy of an
24 organizational chart filed in the bankruptcy proceeding; Case No. 14-31229-SGJ15,
25 Doc. 127, Page 48 of 72, Filed 05/23/2014.

26 3. Tibanne has not provided any additional disclosures or otherwise
27 provided notice of compliance with the requirements in the TRO.

28 DECLARATION OF ROGER M. TOWNSEND IN
29 SUPPORT OF PLAINTIFF'S MOTION FOR TEMPORARY
30 RESTRAINING ORDER - 1
31 (NO. 2:13-cv-777-MJP)

32 BRESKIN | JOHNSON | TOWNSEND PLLC
33 1000 Second Avenue, Suite 3670
34 Seattle, Washington 98104 Tel: 206-652-8660

4. Attached hereto as **Exhibit 2** is a true and correct copy of a report provided by a third party regarding domain names owned or controlled by Tibanne.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 18th day of August, 2014.

BRESKIN JOHNSON & TOWNSEND PLLC

By: /s/ Roger M. Townsend
Roger M. Townsend, WSBA #25525
1000 Second Avenue, Suite 3670
Seattle, WA 98104
Phone: 206-652-8660
Facsimile: 206-652-8290
rtownsend@bjtlegal.com

DECLARATION OF ROGER M. TOWNSEND IN
SUPPORT OF PLAINTIFF'S MOTION FOR TEMPORARY
RESTRAINING ORDER - 2
(No. 2:13-cv-777-MJP)

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Jamie Telegin
Jamie Telegin, Legal Assistant